



August 5, 2013

Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

The South Coast Community Media Access Center dba TV Santa Barbara submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

TV Santa Barbara is a nonprofit community media center empowering community to connect, create and communicate through digital media. We operate a media center which provides our community with more than 1200 hours of local noncommercial programming each year. TVSB programs two PEG channels, TVSB Voice and TVSB Culture. TVSB Voice reflects the diverse voices in our community and TVSB Culture highlights the arts, culture and education of the Santa Barbara region. Our programming is available to over 55,000 subscribers in Southern Santa Barbara County.

We carry programs on our channel(s) which are closed captioned. Some of these programs include a lecture series and *Democracy Now*. The onscreen video programming guide of our multichannel video programming distributor (MVPD), Cox Communications, does not provide a label or symbol indicating that these programs have closed captions.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Cox Communications only provides the program name and description of the program. While we are fortunate that Cox Communications provides some programming information, this level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). While viewers can determine what a program is from the guide, viewers cannot

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determine from the MVPD's video programming guide whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink that reads "Matthew Schuster".

Matthew Schuster, Executive Director  
TV Santa Barbara